

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**AMANDA BOSARGE, individually and on
behalf of their minor children, et al.,**

Plaintiffs,

-against-

**DANIEL P. EDNEY, in his official capacity as
the State Health Officer, et al.,**

Defendants.

Civil Action No. 1:22-cv-00233-
HSO-BWR

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiffs, Amanda Bosarge, Jaquelyn Butler, Kimberly Harrell, William Morgan, Paul Perkins, Brandi Renfroe, and Jeana Stanley, by and through counsel, move this Court to grant an extension through and including December 5, 2022, to file a reply to Defendant Attorney General Lynn Fitch's *Response in Opposition to Plaintiffs' Motion for a Preliminary Injunction and Motion to Consolidate the Preliminary Injunction Hearing with A Trial On the Merits*. [Dkt. # 41].

1. On November 16, 2022, this Court, in a text order, granted Plaintiffs' and Defendant Attorney General Lynn Fitch's *Joint Motion for a Briefing Scheduling Order* [Dkt. #35] whereby the Parties agreed that Plaintiffs' replies in support of the *Motion for Preliminary Injunction* [Dkt. # 3] and *Motion Summary Judgement* [Dkt. # 4] were to be filed by December 1, 2022.

2. On November 21, 2022, Defendant Attorney General Lynn Fitch filed a Motion for *Judgment on the Pleadings or, Alternatively, to Dismiss or Stay Pursuant to Pullman Abstention Doctrine*. [Dkt. #39]. Plaintiffs' response is due on December 5, 2022.

3. Upon examination, it has become clear that the various filings Plaintiffs must submit over the next five days are inextricably intertwined and therefore, in an effort to streamline these papers and avoid unnecessary complication and duplication, and in order to save party and Court resources, Plaintiffs respectfully request an extension of time so all filings can be submitted together.

4. In particular, Plaintiffs' opposition to *Defendant Attorney General Lynn Fitch Motion for Judgment on the Pleadings or, Alternatively, to Dismiss or Stay Pursuant to Pullman Abstention Doctrine* [Dkt. #39], which is due on December 5, 2022, requires argument that directly overlaps with the arguments Plaintiffs must make in their reply, due December 1, 2022, to *Defendant's Response in Opposition*. [Dkt. # 41].

5. Given the overlapping issues, the complexity of the issues presented, and the number of pending motions, Plaintiffs respectfully requests that the Court grant an extension through and including December 5, 2022, to file a reply to Defendant Attorney General Lynn Fitch's *Response in Opposition to Plaintiffs' Motion for a Preliminary Injunction and Motion to Consolidate the Preliminary Injunction Hearing with A Trial On the Merits* [Dkt. # 41].

6. Opposing counsel, representing Defendant Attorney General Lynn Fitch, has authorized Plaintiffs to represent that the request for an extension herein is unopposed.

Dated: December 1, 2022.

Respectfully submitted,

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